

REMARKS/ARGUMENTS

STATUS OF THE CLAIMS

Claims 1-48 and 69-71 are pending with entry of these amendments. Claims 1, 5, and 8 are amended herein, claim 7 is canceled herein, and new claims 69-71 are added herein. Claim 37 was previously presented and claims 49-68 were previously canceled without prejudice.

These clarifying amendments introduce no new matter and support is replete throughout the specification as originally filed. Exemplary support for amended claim 1 is found in, e.g., canceled claim 7 and in paragraphs [0009], [0010], and [0045]. Exemplary support for new claim 69 is found in, e.g., the previously version of claim 1. Exemplary support for new claims 70 and 71 is found in, e.g., the paragraph [0045].

These amendments are made without prejudice and are not to be construed as an abandonment of the previously claimed subject matter or agreement with any objection or rejection of record. Applicant respectfully requests that all of these amendments be entered.

35 U.S.C. § 103

The Action rejects various claims as allegedly being obvious under 35 U.S.C. § 103, namely, claims 1, 2, 5, 7-10, 12-39, 41-44, and 46-48 over U.S. Pat. No. 6,467,285 to Felder et al. (hereinafter, Felder) in view of U.S. Pat. No. 5, 842,179 to Beavers et al. (hereinafter, Beavers); claim 3 over Felder in view of Beavers as applied to claims 1, 2, 5, 7-10, 12-39, 41-44, and 46-48 and further in view of U.S. Pat. No. 4,800,728 to Klee (hereinafter, Klee); claim 4 over Felder in view of Beavers as applied to claims 1, 2, 5, 7-10, 12-39, 41-44, and 46-48 and further in view of Klee and U.S. Pat. No. 5,921,102 to Vago (hereinafter, Vago); claim 6 over Felder in view of Beavers as applied to claims 1, 2, 5, 7-10, 12-39, 41-44, and 46-48 and further in view of U.S. Pat. No. 5,758,913 to Roth et al. (hereinafter, Roth); claim 11 over Felder in view of Beavers as applied to claims 1, 2, 5, 7-10, 12-39, 41-44, and 46-48 and further in view of U.S. Pat. No. 4,314,459 to Rivoire (hereinafter, Rivoire); and claims 40 and 45 over Felder in view of Beavers as applied to claims 1, 2, 5, 7-10, 12-39, 41-44, and 46-48 and further in view of U.S. Pat. No. 5,660,046

to de Langavant et al. (hereinafter, de Langavant). Applicants respectfully traverse these rejections for the reasons specified below.

Claim 1 is the only independent claim among these rejected claims. As amended, claim 1 recites a compound storage and retrieval system that includes storage modules comprising a door controlling access to one or more racks within the storage module. The racks comprise one or more slots, which slots receive one or more trays. In addition, one or more of the slots are associated with one or more tray location indicators. The system also includes a work area providing operator access to the one or more storage modules. In addition, the system also includes a computer system operably coupled to the storage modules that implement one or more tray transfer operations between the storage module and the work area. The computer system controls the tray location indicators and transmits one or more commands directing actuation of one or more of the tray location indicators that direct an operator to a tray location of interest when the operator is in the work area.

Applicants respectfully submit that none of the cited art, whether considered individually or in any combination, teaches or suggests all of the limitations of claim 1. To illustrate, none of the cited passages from this art teaches or suggests tray location indicators associated with slots of racks within storage modules as claimed. Moreover, this art also does not teach or suggest the recited computer system that controls the tray location indicators and transmits commands directing actuation of the tray location indicators that direct an operator to a tray location of interest when the operator is in the work area. In contrast, Felder describes an automated storage and retrieval apparatus that involves a storage carousel and an interchange mechanism disposed in a freezer compartment. However, Felder fails to teach tray location indicators associated with any slots of the storage carousel. As acknowledged in the Action, the bar code described in Felder, which the Action equates with a “flag” (see, Action at page 2) is assigned to *containers*. That is, not to the *slots* of racks as recited in claim 1. Felder also fails to teach or suggest computer systems that control tray location indicators associated with the slots of racks. Further, Felder also fails to teach or suggest commands directing actuation of the tray location indicators that would direct an operator to a tray location of interest when the operator is in the work area. Moreover, none of the passages from the remaining cited art teach or suggest these missing

limitations. Since claim 1 is non-obvious over this art, all of the claims depending from claim 1 are also necessarily non-obvious as well. Accordingly, Applicants respectfully request that all of these rejections be withdrawn.

CONCLUSION

In view of the foregoing, the Applicants believe that all pending claims are non-obvious over the cited art, and accordingly are in a condition for allowance. Applicants respectfully request the issuance of a formal notice of allowance at an early date.

If the Examiner believes a telephone conference would be of further assistance, please telephone the undersigned at the number indicated below.

In the event that the U.S. Patent and Trademark Office determines that further extensions and/or other relief is required, Applicant petitions for any required relief including extensions of time and authorize the Assistant Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 50-1885 referencing docket No. P1047US10.

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Respectfully submitted,

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